

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ELEANOR ("RONNIE") BEHRINGER,

Plaintiff,

-against-

LAVELLE SCHOOL FOR THE BLIND and
FRANK SIMPSON,

Defendants.

Civil Action No.: 08-4899 (JGK-THK)

AFFIDAVIT OF TERESA WELSH

TERESA WELSH, being duly sworn, deposes and says:

1. I am employed by Lavelle School for the Blind ("Lavelle") as Controller. I have worked for Lavelle in this position since June 7, 1999, and report directly to the Treasurer of Lavelle's Board. I do not report to the School Superintendent, Frank Simpson.

2. The matters stated in this affidavit are based on my personal knowledge.

3. My responsibilities as Controller include managing Lavelle's finances and budget.

4. Lavelle relies almost entirely on state funding to maintain its operations.

5. In addition to managing Lavelle's finances and budget, I also oversee employee payroll and compensation matters, including salary increases for the principals and other non-union employees.

6. Salary increases for Lavelle's principals and non-union employees are contingent on a host of factors, including the amount of state funding Lavelle receives.

7. Salary adjustments for Lavelle's principals and non-union employees are made according to the academic calendar (September through June).

8. There are no guaranteed salary increases for Lavelle's principals and non-union employees.

9. In fact, no Lavelle principal received a salary increase for the 2009 – 2010 school year.

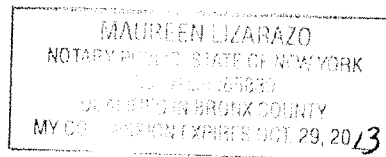
10. At present, due to New York's significant cuts in human services funding, the School has made no decisions as to salaries for principals and non-union employees for the 2011 – 2012 school year.

Teresa Welsh

TERESA WELSH

Sworn to before me this
14th day of March 2011

Maureen Lizarazo
Notary Public



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AFFIDAVIT OF TERESA WELSH

KELLEY DRYE & WARREN LLP

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